

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Shirley Burton,

Chapter 13

Debtor

Bankruptcy No. 19-14289-amc

**STIPULATION FOR DETERMINATION OF FINAL CURE  
OF POSTPETITION MORTGAGE PAYMENTS**

The parties to this Stipulation, debtor Shirley Burton and creditor Mortgage Asset Management, LLC (“MAM”), through counsel, hereby stipulate as follows:

1. The Debtor filed this voluntary petition under Chapter 13 of the Bankruptcy Code on July 17, 2019.
2. On July 18, 2024, upon completion of the debtor’s plan, the Trustee issued his Notice of Final Cure pursuant to Bankruptcy Rule 3003.1(f) with respect to the claim of MAM (claim no. 2).
3. On July 29, 2024, MAM filed a response to the Trustee’s cure notice, agreeing that Debtor had cured prepetition mortgage arrears, but asserting that it had incurred postpetition fees, charges, expenses, and charges totaling \$2,168.00.
4. The Court entered an Order of Discharge on August 8, 2024.
5. On August 26, 2024, the debtor filed a motion disputing MAM’s response and asking the Court to determine the final cure amount.
6. Subsequently, on August 28, 2024, MAM filed an amended response to the Trustee’s cure notice.

7. MAM having made further adjustments to the amounts claimed for lender-placed hazard insurance, the parties now agree that postpetition fees and costs are due to MAM in the amount of \$1,225.24.

8. The parties therefore stipulate, subject to Court approval, that postpetition fees, expenses, and charges are due to MAM in the total amount of \$1,225.24

/s/ Peter D. Schneider

Attorney for Debtor  
Community Legal Services of Philadelphia  
1424 Chestnut Street  
Philadelphia PA 19102  
215-981-3718  
[pschneider@clsphila.org](mailto:pschneider@clsphila.org)

/s/Andrew Spivack Andrew Spivack

Attorney for Creditor  
Brock & Scott, PLLC  
3825 Forrestgate Drive  
Winston Salem, NC 27103  
844-856-6646  
[PABKR@brockandscott.com](mailto:PABKR@brockandscott.com)

Approved by the Court:

---

Ashely M. Chan  
Chief U.S. Bankruptcy Judge